

# **Exhibit A**

<p style="text-align: right;">Page 6</p> <p>1 and</p> <p>2</p> <p>3</p> <p>4 THAT the questioning attorney shall provide</p> <p>5 counsel for the witness examined herein with a</p> <p>6 copy of this examination at no charge.</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1</p> <p>2 New York, New York.</p> <p>3 MS. DYER: For the</p> <p>4 Defendant, Alex Shnaider, Karen</p> <p>5 Dyer, Boies, Schiller &amp; Flexner.</p> <p>6 Also, with me is my colleague</p> <p>7 Reece Dameron.</p> <p>8 THE VIDEOGRAPHER: Will the</p> <p>9 court reporter please swear in</p> <p>10 the Witness?</p> <p>11 E D U A R D S L I N I N, the</p> <p>12 WITNESS herein, having been first</p> <p>13 duly sworn by a Notary Public of</p> <p>14 the State of New York, was</p> <p>15 examined and testified as</p> <p>16 follows:</p> <p>17 EXAMINATION BY</p> <p>18 MS. DYER:</p> <p>19 Q. State your name for the</p> <p>20 record, please.</p> <p>21 A. Eduard Slinin.</p> <p>22 Q. State your address for the</p> <p>23 record, please.</p> <p>24 A. 42 Dora Lane, Holmdel, New</p> <p>25 Jersey 07733.</p>
<p style="text-align: right;">Page 7</p> <p>1</p> <p>2 THE VIDEOGRAPHER: We are</p> <p>3 now on the record. This begins</p> <p>4 DVD number 1 in the deposition of</p> <p>5 Eduard Slinin in the matter of</p> <p>6 Eduard Slinin against Alex</p> <p>7 Shnaider in the United States</p> <p>8 District Court, Southern District</p> <p>9 of New York. The deposition is</p> <p>10 being held at the law office of</p> <p>11 Boies, Schiller &amp; Flexner, LLP,</p> <p>12 located at 575 Lexington Avenue</p> <p>13 New York, New York. Today's date</p> <p>14 is September 26th, 2017, and it</p> <p>15 is approximately 11:03 a.m. My</p> <p>16 name is Rodolfo Duran, I am the</p> <p>17 videographer. The court reporter</p> <p>18 is Paige Hayden. We are both in</p> <p>19 association with Magna Legal</p> <p>20 Services. Will all parties</p> <p>21 present please state their names</p> <p>22 and whom they represent.</p> <p>23 MR. LEBOWITZ: For the</p> <p>24 Plaintiff, Eduard Slinin,</p> <p>25 Laurence Lebowitz, 225 Broadway,</p>	<p style="text-align: right;">Page 9</p> <p>1 E. SLININ</p> <p>2 MR. LEBOWITZ: I will be</p> <p>3 requesting a copy of the</p> <p>4 transcript.</p> <p>5 Q. Mr. Slinin, good morning.</p> <p>6 We have met before.</p> <p>7 Have you ever been deposed</p> <p>8 before?</p> <p>9 A. Yes.</p> <p>10 Q. How many times?</p> <p>11 A. A couple of times.</p> <p>12 Q. Do you recall when the last</p> <p>13 time was that you were deposed?</p> <p>14 A. It was a labor case about</p> <p>15 two years ago.</p> <p>16 Q. Was it a labor case</p> <p>17 involving a company that you have any</p> <p>18 ownership interest in?</p> <p>19 A. Yes, Corporate</p> <p>20 Transportation Group.</p> <p>21 Q. And were you a party to that</p> <p>22 case?</p> <p>23 A. Yes, it was a lawsuit --</p> <p>24 drivers against my company, drivers</p> <p>25 versus independent contractors.</p>

<p style="text-align: right;">Page 14</p> <p>1 E. SLININ</p> <p>2 We made a deal, Alex</p> <p>3 Shnaider and me, okay, it's</p> <p>4 self-explanatory. We were partners on</p> <p>5 specific business by buying aircrafts</p> <p>6 from Bombardier and selling them to</p> <p>7 customers. We were partners and there</p> <p>8 was a clear picture that where we were</p> <p>9 receiving the deposits we were going</p> <p>10 50/50, and then when the economy</p> <p>11 turned around, some of the buyers</p> <p>12 decided to come out of the contracts.</p> <p>13 We then had spoken on the phone, and</p> <p>14 Alex came across to me and said,</p> <p>15 "Look, this is how we are going to do</p> <p>16 this. We will work with the</p> <p>17 Bombardier, and we will return those</p> <p>18 contracts back, and we will end up</p> <p>19 buying one Challenger 850 green, and</p> <p>20 one Lear 60 XR, and then once we able</p> <p>21 to sell those two aircrafts, we will</p> <p>22 then calculate everything, we will</p> <p>23 then split the money 50/50." It was</p> <p>24 always like that.</p> <p>25 Q. So, I want to focus on the</p>	<p style="text-align: right;">Page 16</p> <p>1 E. SLININ</p> <p>2 knowledge?</p> <p>3 A. Um, I believe Rob Lee put</p> <p>4 them in writing.</p> <p>5 Q. As you sit here today, do</p> <p>6 you recall how that 6.5 million</p> <p>7 dollars broke down?</p> <p>8 A. Yes, I can give you a full</p> <p>9 breakdown.</p> <p>10 Q. Okay.</p> <p>11 A. I end up buying one of the</p> <p>12 aircrafts from one of the buyers with</p> <p>13 Alex discussions. When we were in</p> <p>14 Switzerland, I called Alex, I said,</p> <p>15 "Alex, this is the circumstance, the</p> <p>16 guy wants to sell one position." He</p> <p>17 said, "No problem, let's buy it back."</p> <p>18 He said, "I tell you what, you buy it</p> <p>19 back, and I will sell it pretty quick</p> <p>20 because I do have a buyer for it." At</p> <p>21 that time I laid out my own money, my</p> <p>22 own capital, and I purchased the</p> <p>23 aircraft. Then the buyer did not</p> <p>24 proceed. When things went bad, Alex</p> <p>25 called me up and said, "How about</p>
<p style="text-align: right;">Page 15</p> <p>1 E. SLININ</p> <p>2 damages because that maybe goes a</p> <p>3 little more to your theory of</p> <p>4 liability. I am just focusing on how</p> <p>5 you arrived at the amount of the 6.5</p> <p>6 million.</p> <p>7 Is it your testimony that</p> <p>8 the 6.5 million that you are claiming</p> <p>9 in this lawsuit is your share of the</p> <p>10 profits from the two aircrafts that</p> <p>11 ultimately were delivered, that you</p> <p>12 just described, one being a green 850,</p> <p>13 and one being a Learjet?</p> <p>14 A. Correct.</p> <p>15 Q. Let me just ask you, who</p> <p>16 actually did the calculation to arrive</p> <p>17 at that 6.5 million; if you know?</p> <p>18 A. It was Alex Shnaider, Rob</p> <p>19 Lee, and myself.</p> <p>20 Q. Do you know when this</p> <p>21 calculation was done?</p> <p>22 A. We are on the telephone</p> <p>23 doing all the calculations.</p> <p>24 Q. Did anybody put those</p> <p>25 calculations in writing; to your</p>	<p style="text-align: right;">Page 17</p> <p>1 E. SLININ</p> <p>2 this, you sign this over to me, we</p> <p>3 will return this part of the</p> <p>4 negotiations to Bombardier. We will</p> <p>5 be able to get all the money applied</p> <p>6 to the green aircraft. When the green</p> <p>7 aircraft will be sold, I will return</p> <p>8 all the money back to you so you are</p> <p>9 not losing anything." I said, "Alex,</p> <p>10 it's perfectly fine with me, we can do</p> <p>11 that." That's how whole thing</p> <p>12 started. So, the calculation stands</p> <p>13 the following, he owes me</p> <p>14 \$2,000,000.00 on my aircraft.</p> <p>15 Q. When you say, "my aircraft"</p> <p>16 --</p> <p>17 A. The Challenger 850 that I</p> <p>18 purchased from the buyer.</p> <p>19 Q. The one you were referring</p> <p>20 to?</p> <p>21 A. I think the contract number</p> <p>22 -- you can probably take a look, I</p> <p>23 think it's 169 to the best of my</p> <p>24 knowledge. And he said the following,</p> <p>25 "You return this back to me. You sign</p>

<p style="text-align: right;">Page 42</p> <p>1 E. SLININ</p> <p>2 any of that. For furthermore, if I</p> <p>3 brought the buyer, or any transaction</p> <p>4 took place, I would call Alex</p> <p>5 Shnaider, he will then put Rob Lee,</p> <p>6 and they both will do paperwork</p> <p>7 because I was not handling any of the</p> <p>8 paperwork.</p> <p>9 Q. That is fine.</p> <p>10 I just asked if you</p> <p>11 recognize the document.</p> <p>12 A. No. I mean, the company</p> <p>13 Xaman I recognize. They were one of</p> <p>14 the aircrafts contracts holder.</p> <p>15 Q. When you say, "Xaman," where</p> <p>16 are you reading from, sir?</p> <p>17 A. Right at top, "beneficial</p> <p>18 owner of Xaman Holdings Limited."</p> <p>19 Q. J-o-f-a-n?</p> <p>20 A. X-a --</p> <p>21 Q. I'm sorry.</p> <p>22 MR. LEBOWITZ: You have</p> <p>23 given us a document with a Bates</p> <p>24 number PO10752.</p> <p>25 Q. So, before you as Slinin</p>	<p style="text-align: right;">Page 44</p> <p>1 E. SLININ</p> <p>2 familiar with an entity by the name</p> <p>3 Jofan Holding?</p> <p>4 A. It's one of the aircrafts</p> <p>5 contracts holding.</p> <p>6 Q. Do you know if Jets</p> <p>7 Worldwide, LLC, ever held any</p> <p>8 ownership interest in Jofan?</p> <p>9 A. I would not know. I would</p> <p>10 not remember. The correct answer can</p> <p>11 be given to you by Rob Lee and Alex</p> <p>12 Shnaider.</p> <p>13 Q. Try to focus on the question</p> <p>14 so the record is clear. If you need</p> <p>15 to say anything else, I am sure your</p> <p>16 Counsel will bring that up.</p> <p>17 What about Setius,</p> <p>18 S-E-T-I-U-S Technologies Limited; are</p> <p>19 you familiar with that company?</p> <p>20 A. I don't remember.</p> <p>21 Q. Do you know if Jets</p> <p>22 Worldwide had an ownership interest in</p> <p>23 Setius Technologies Limited?</p> <p>24 A. I don't remember. I don't</p> <p>25 recall.</p>
<p style="text-align: right;">Page 43</p> <p>1 E. SLININ</p> <p>2 Exhibit 2, is a reference to Xaman.</p> <p>3 Are you familiar with that</p> <p>4 company at all?</p> <p>5 A. That was one of the</p> <p>6 companies that Alex Shnaider and Rob</p> <p>7 Lee I think created, whatever they</p> <p>8 were doing. All the paperwork, all</p> <p>9 the contractuals, all the legal, all</p> <p>10 the administerial we call it, Alex</p> <p>11 Shnaider and Rob Lee was handling that</p> <p>12 all along, and George Rependa.</p> <p>13 Q. It indicates here that Jets</p> <p>14 Worldwide, LLC, owns 30 percent of</p> <p>15 Xaman; right?</p> <p>16 A. I don't recall that.</p> <p>17 Q. I am asking if it is</p> <p>18 indicated on the document?</p> <p>19 A. That is correct.</p> <p>20 Q. It also indicates that Mr.</p> <p>21 Pirumov is the beneficial owner,</p> <p>22 owning 70 percent of Xaman; correct?</p> <p>23 A. Correct.</p> <p>24 Q. Let me show you what we will</p> <p>25 mark as -- let me ask you, are you</p>	<p style="text-align: right;">Page 45</p> <p>1 E. SLININ</p> <p>2 Q. What about Stogan Assets</p> <p>3 Incorporated?</p> <p>4 A. Stogan is one of the</p> <p>5 contracts for Bombardier.</p> <p>6 Q. You are familiar with --</p> <p>7 A. Stogan was, I remember, just</p> <p>8 slightly that was a name that was</p> <p>9 utilized that Alex has given to me.</p> <p>10 Q. Let me mark as Exhibit 3,</p> <p>11 Slinin Exhibit 3.</p> <p>12 (Whereupon, a confirmation</p> <p>13 letter was marked as Slinin</p> <p>14 Exhibit 3, for identification, as</p> <p>15 of this date.)</p> <p>16 Q. I placed before you sir,</p> <p>17 Slinin 3, which is a confirmation</p> <p>18 letter. It appears unsigned, and it</p> <p>19 says, "Jets Worldwide, LLC," being the</p> <p>20 shareholder of Stogan Assets</p> <p>21 Incorporated, defined as the company,</p> <p>22 owns 30 percent of the company's</p> <p>23 shares.</p> <p>24 Do you see that?</p> <p>25 A. Yes, I do.</p>

<p style="text-align: right;">Page 50</p> <p>1 E. SLININ 2 Worldwide, LLC -- 3 A. Yes. 4 Q. Let me just finish the 5 question. 6 "Mr. Eduard Slinin, 7 beneficial owner;" correct? 8 A. Yes. 9 Q. And then on the fourth page, 10 is that your signature there? 11 A. That is correct. 12 Q. It says, "name" underneath 13 your signature, Eduard Slinin, Jets 14 Worldwide, LLC, of the State of the 15 Delaware; correct? 16 A. Correct. 17 Q. If you go back to page two 18 of the document, sir. The first 19 paragraph, it indicates that you are 20 the beneficial owner as the 21 undersigned of Xaman Holdings Limited; 22 correct? 23 A. That's correct. 24 Q. Okay. 25 And you are instructing that</p>	<p style="text-align: right;">Page 52</p> <p>1 E. SLININ 2 A. I don't remember. Again, 3 everything was commended by Alex 4 Shnaider and Rob Lee. 5 Q. Do you know why you 6 transferred ownership back to Mr. 7 Pirumov of Xaman Holdings Limited, 8 sir? 9 A. I don't remember. 10 Q. I think you told me a few 11 moments ago, you didn't recognize the 12 name Jets Worldwide, LLC; is that 13 correct? 14 A. I can't remember. It's too 15 many years ago that is why it did not 16 come up. Maybe one of the companies 17 was done for purpose of this 18 transaction for Mr. Pirumov. I don't 19 -- again, I was not involved in the 20 administrative paperwork, it was done 21 between Rob Lee, Alex Shnaider, and 22 some proportion of Mr. Vadim 23 Zilberman. 24 Q. But for example, with regard 25 to Exhibit 5 that we were just looking</p>
<p style="text-align: right;">Page 51</p> <p>1 E. SLININ 2 the beneficial ownership of the shares 3 in Xaman Holdings be transferred to 4 Mr. Pirumov; correct? 5 A. Correct. 6 Q. If you look at the third 7 page, you resign as beneficial owner 8 of the company; is that correct? 9 A. That what -- that I 10 resigned? 11 Q. Yes, "Please accept this 12 letter as my resignation as beneficial 13 owner of the above named company with 14 the effect from the above date 15 hereof." 16 Do you see that? 17 A. Yes. 18 Q. So, you are resigning as the 19 beneficial owner of Xaman Holdings as 20 of August 15th, 2008; correct? 21 A. Correct. 22 Q. Do you know why you 23 transferred -- well -- strike that. 24 Do you know how you got 25 ownership of Xaman Holdings Limited?</p>	<p style="text-align: right;">Page 53</p> <p>1 E. SLININ 2 at, you are not disputing that that is 3 your signature on this document? 4 A. It is my signature. I mean, 5 that looks like my signature, but 6 anything else, I can't remember. 7 Again, Alex Shnaider would call me on 8 the phone, "Eddy this is how we are 9 going to do things. I need you to do 10 this, this, and this," and I followed 11 his instructions. 12 Q. So, you don't have any 13 reason to believe that you didn't 14 sign, for example, the documents that 15 are part of Exhibit 5? 16 A. I can't remember. 17 Q. Let me show you what we will 18 mark as Slinin Exhibit 6. 19 (Whereupon, a Limited 20 Liability Company Agreement for 21 Jets Worldwide, LLC, was marked 22 as Slinin Exhibit 6, for 23 identification, as of this date.) 24 Q. Let me ask you to take a 25 look at Slinin Exhibit 6, which for</p>



<p style="text-align: right;">Page 98</p> <p>1 E. SLININ</p> <p>2 cars, then you would reach out to one</p> <p>3 of these other entities; correct?</p> <p>4 A. Correct.</p> <p>5 Q. Do you know if Corporate</p> <p>6 Transportation Group Limited pays them</p> <p>7 a set fee to that transportation</p> <p>8 company to carry your passengers, or</p> <p>9 if they pay in some other fashion?</p> <p>10 A. It's per market. It's all</p> <p>11 in the market, and every marketplace</p> <p>12 has its own rates.</p> <p>13 Q. For each marketplace you pay</p> <p>14 a set rate then to the transportation</p> <p>15 company that you contract with; is</p> <p>16 that correct?</p> <p>17 A. Correct. In other words,</p> <p>18 when the job comes in we already know</p> <p>19 who is who. There will be a minimum,</p> <p>20 let's say of \$50.00 or \$45.00, depends</p> <p>21 on where it is, how far it is from the</p> <p>22 airport to the hotel, or to the</p> <p>23 residence to the office. We have</p> <p>24 everything -- it's a computerize</p> <p>25 database that we have in our system.</p>	<p style="text-align: right;">Page 100</p> <p>1 E. SLININ</p> <p>2 What is the name of that</p> <p>3 partnership?</p> <p>4 A. Eduard Slinin and Alex</p> <p>5 Shnaider.</p> <p>6 Q. And where is that</p> <p>7 partnership located?</p> <p>8 A. It was a verbal agreement in</p> <p>9 New York City.</p> <p>10 Q. Do you know if any documents</p> <p>11 were ever filed with any governmental</p> <p>12 entity in New York regarding that</p> <p>13 partnership?</p> <p>14 A. No.</p> <p>15 Q. They were not, or you don't</p> <p>16 know?</p> <p>17 A. I don't know.</p> <p>18 Q. What is the ownership of the</p> <p>19 Eduard Slinin/Alex Shnaider</p> <p>20 partnership?</p> <p>21 A. It was a 50/50 total</p> <p>22 agreement on all profits to be made.</p> <p>23 Q. Do you know if the Eduard</p> <p>24 Slinin/Alex Shnaider partnership ever</p> <p>25 obtained any type of certificate to</p>
<p style="text-align: right;">Page 99</p> <p>1 E. SLININ</p> <p>2 Q. Do you share in the profits</p> <p>3 of any of these other companies that</p> <p>4 you contract for services with?</p> <p>5 A. Of course we share the</p> <p>6 profit.</p> <p>7 Q. Do you actually share in the</p> <p>8 overall end profits of that entity?</p> <p>9 A. No, no, no. It's per ride,</p> <p>10 it's per ride. Per transaction we</p> <p>11 make whatever the spread is.</p> <p>12 Q. You don't have an ownership</p> <p>13 interest in any of the other entities</p> <p>14 that you refer to as "affiliate</p> <p>15 partners;" correct?</p> <p>16 A. No.</p> <p>17 Q. And you don't share in the</p> <p>18 cost of any of the affiliate partners;</p> <p>19 correct?</p> <p>20 A. No.</p> <p>21 Q. You have alleged in this</p> <p>22 lawsuit that there is a partnership</p> <p>23 between you and Mr. Shnaider; correct?</p> <p>24 A. That is correct.</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 101</p> <p>1 E. SLININ</p> <p>2 operate in New York?</p> <p>3 A. No.</p> <p>4 Q. Do you know if it was</p> <p>5 required to obtain any type of</p> <p>6 certificate to operate?</p> <p>7 A. No.</p> <p>8 Q. You don't know?</p> <p>9 A. I don't know.</p> <p>10 Q. Okay.</p> <p>11 Do you know if the Eduard</p> <p>12 Slinin/Alex Shnaider partnership that</p> <p>13 you referred to ever filed any type of</p> <p>14 tax returns with the federal</p> <p>15 authorities?</p> <p>16 A. No.</p> <p>17 Q. You don't know?</p> <p>18 A. No.</p> <p>19 Q. Do you know if the Eduard</p> <p>20 Slinin/Alex Shnaider partnership that</p> <p>21 you have alleged, ever filed any tax</p> <p>22 return with any state authority?</p> <p>23 A. I don't know.</p> <p>24 Q. Do you know if the Eduard</p> <p>25 Slinin/Alex Shnaider partnership ever</p>